COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Proceeding by the Department of Telecommunications and Energy on its own Motion to Implement the Requirements of the Federal Communications Commission's Triennial Review Order Regarding Switching for Mass Market Customers	D.T.E. 03-60

AT&T's FIRST SET OF INFORMATION REQUESTS TO VERIZON-MASSACHUSETTS

AT&T Communications of New England, Inc. ("AT&T") hereby submits to Verizon-Massachusetts ("Verizon") the following information requests. AT&T requests responses in accordance with the Procedural Order Memorandum and Ground Rules issued by the Department in this docket on October 17, 2003.

INSTRUCTIONS

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.

2. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.

3. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.

4. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.

5. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

INFORMATION REQUESTS

Questions Relevant to Verizon's Mass Market Switching Claims

ATT-VZ-1 Please provide in manipulable electronic form (e.g., an Excel spreadsheet) a table which sets forth the following information for each Verizon host or remote central office ("CO") in the state of Massachusetts:

(a) the 11-digit Common Language Location Identifier ("CLLI") code of the switch as it appears in the Local Exchange Routing Guide ("LERG");

(b) the associated LATA number;

(c) address, including City or Town;

(d) the Metropolitan Statistical Area ("MSA") within which the central office is located;

(e) the UNE rate density zone within which the central office is located;

(f) the total number of voice-grade equivalent lines served by Verizon's switch on a DS0 voice grade equivalent basis;

(g) the total number of UNE-L cross-connects in service in the CO;

(h) whether the CO is staffed full time (i.e., during regular business hours), part-time (and if so, on what basis), or unstaffed;

(i) the total amount of space in each CO currently being used by collocators; and

(j) the total amount of space available for use by collocators (which does not include space reserved for Verizon or its affiliates).

ATT-VZ-2 For each wire center identified in response to ATT-VZ-1, please provide the total number of voice-grade equivalent lines served by Verizon's switch on a DS0 voice grade equivalent basis, and please subdivide that total into the following categories:

(a) the total number of enterprise customers of Verizon served through such switch, and the total number of loops on a DS0 voice grade equivalent basis serving such customers;

(b) the total number of enterprise customers of any CLEC served on a UNE-P basis through such switch, and the total number of loops on a DS0 voice grade equivalent basis serving such customers;

(c) the total number of mass market small business customers of Verizon served through such switch, and the total number of loops on a DS0 voice grade equivalent basis serving such customers;

(d) the total number of mass market small business customers of any CLEC served on a UNE-P basis through such switch, and the total number of loops on a DS0 voice grade equivalent basis serving such customers;

(e) the total number of mass market residential customers of Verizon served through such switch, and the total number of loops on a DS0 voice grade equivalent basis serving such customers; and

(f) the total number of mass market residential customers of any CLEC served on a UNE-P basis through such switch, and the total number of loops on a DS0 voice grade equivalent basis serving such customers;

ATT-VZ-3 For each CLEC that Verizon claims in its Initial Panel Testimony regarding Mass Market Switching (dated November 14, 2003) is a self-provider of switching to serve mass market customers in Massachusetts, please provide the following information with respect to each Verizon wire center area within which Verizon claims that the CLEC is a self-provider of mass market switching, in manipulable electronic form (e.g., Excel spreadsheet), and for all line count information please also provide subtotals for each MSA and each density zone, as well as statewide totals, by CLEC:

(a) The 11-digit Common Language Location Identifier ("CLLI") code of each wire center area in which Verizon claims that the CLEC self-provisions switching.;

(b) the Metropolitan Statistical Area ("MSA") within which the wire center area is located;

(c) The UNE rate density zone within which the wire center area is located;

(d) The number of stand-alone UNE loops in each wire center that Verizon identified in its "Line Count Study" from Verizon's internal databases (see Testimony p.18);

(e) The number of stand-alone UNE loops in each wire center that "bypass Verizon MA's network" and which Verizon identified from "residential listings in the E911 database" (see Testimony p.18);

(f) The number of stand-alone UNE loops in each wire center that Verizon identified from any source other than its "Line Count Study" or "residential listings in the E911 database" (see Testimony p.18);

(g) The total number of the loops identified in response to parts (d), (e), and (f), and an explanation for any variance between these totals and the summary figures provided in Attachment 2 to Verizon's Initial Panel Testimony regarding Mass Market Switching (dated November 14, 2003)

(h) To the extent that Verizon has information regarding which of the loops identified in response to parts (d), (e), (f), and (g) above are used to provide service to residential customers, provide the total number of such residential loops by wire center area, with subtotals for each MSA and each density zone, and statewide totals; and

(i) To the extent that Verizon has information regarding which of the loops identified in response to parts (d), (e), (f), and (g) above are used to provide service to small business customers, provide the total number of such small business loops by wire center area, with subtotals for each MSA and each density zone, and statewide totals.

ATT-VZ-4 Please provide, in manipulable electronic form (e.g., spreadsheets), copies of all underlying source data, exhibits, tables, maps, spreadsheets, programs, and all other supporting data and source materials for Attachments 1, 2, and 3 to Verizon's Initial Panel Testimony.

ATT-VZ-5 For each CLEC that Verizon has identified in its Initial Panel Testimony regarding Mass Market Switching (dated November 14, 2003) as a self-provider of switching to serve mass market customers, please provide the following information about the CLEC's retail business customers who are served by 24 or fewer DS0 loops at a single location.

(a) Specify the number of business customers served by the CLEC by the number of such DS0 loops (i.e., identify the number of business customers with a single loop, with two loops, three loops, etc., through 24 loops).

(b) Specify, for each wire center where Verizon claims the self-provisioning trigger for mass market switching has been met, the number of business customers served by the CLEC by the number of DS0 loops, according to the following groupings:

(i) The number of business customers with 1 to 4 lines,
(ii) The number of business customers with 5 to 8 lines,
(iii) The number of business customers with 9 to 16 lines, and
(iv) The number of business customers with 17 to 24 lines.

ATT-VZ-6 With respect to each CLEC claimed by Verizon to be a self-provider of switching in Massachusetts, produce any and all documents substantiating that claim.

ATT-VZ-7 For each CO listed in response to ATT-VZ-1, identify each collocation arrangement in that CO, by stating the following with respect to the collocation arrangement:

(a) The name of the entity to which the collocation arrangement is provided;

(b) The type of collocation arrangement (i.e. caged, cageless, virtual);

(c) The size of the collocation arrangement (if virtual, the number of equipment frames);

(d) The date on which the collocation arrangement was first provided, and the name of the entity to which it was provided;

(e) The date on which the collocation arrangement was last augmented (if applicable);

(f) Whether the collocation arrangement has ever been used for gaining access to Verizon's unbundled loops and, if so, whether it currently is being used for such purpose;

(g) The number of Verizon loops, by type (e.g., analog UNE, DS-1 UNE, analog special access, DS-1 special access, etc.) provisioned to each such collocation arrangement during:

(i) second quarter, 2003
(ii) first quarter, 2003
(iii) fourth quarter, 2002
(iv) third quarter, 2002
(v) second quarter, 2002
(vi) first quarter, 2002
(vii) calendar year, 2001
(viii) calendar year, 2000; and

(h) The number of cross connects existing between Verizon's main distribution frame and the collocation arrangement as of the end of the following periods:

(i) second quarter, 2003
(ii) first quarter, 2003
(iii) fourth quarter, 2002

(iv) third quarter, 2002
(v) second quarter, 2002
(vi) first quarter, 2002
(vii) calendar year, 2001
(viii) calendar year, 2000

ATT-VZ-8 Provide the number of loops, by calendar year and by central office (by applicable CLLI code), in Massachusetts that are served by:

(a) IDLC arrangements;

(b) NGDLC arrangements; or

(c) UDLC arrangements.

(d) Of the IDLC loops, please state how many loops are transferable to universal digital loop carrier (UDLC) without additional construction.

ATT-VZ-9 Provide a forecast for the next five years, or the longest available forecast if a five-year forecast is not available, identifying the number of loops in Massachusetts that Verizon intends to serve via:

(a) IDLC loop arrangements.

(b) NGDLC loop arrangements.

ATT-VZ-10 Are there any customers being served via UNE-P today that could not be served via UNE-L (such as for reasons of no copper to replace UDLC, etc.)? If so, please identify the number of such customers by wire center or CLLI code. For the Verizon access lines that are currently provisioned on IDLC technology, please state the percentage of such access lines for which Verizon has existing, parallel copper or Universal Digital Loop Carrier ("UDLC") facilities available for hot cut conversions.

ATT-VZ-11 Please provide Verizon's variable costs, marginal costs, and forward-looking economic costs for local, long distance, and broadband services individually and as part of a bundled offering.

ATT-VZ-12 Please provide, chronologically by tariff filing date, a list of Verizon business and residential retail price or service changes for years 2002 and 2003 (to date) and, for each tariff filing, explain the services involved and the nature of the change (e.g., change in price, change in term, new bundle of services, etc.). Please include all state and federal tariffs under which service is offered in Massachusetts.

ATT-VZ-13 Identify and describe any constraints (if any) on Verizon MA's ability to a) reduce prices in relation to some measure of cost (e.g., price floor based on TSLRIC); b) target price reductions to geographic areas; c) target price reductions to types of customers (including individual customers).

ATT-VZ-14 Produce all documents referring to or discussing any strategic behavior (*e.g.*, pricing offers, packaged or bundled service offerings, waiver of fees, term contract offerings) that Verizon has implemented or evaluated in response or potential response to one or more CLEC's planned or actual entry into a local service market, either: (a) in Massachusetts; or (b) in some other state.

ATT-VZ-15 On a wire center basis, please provide Verizon's average local revenue per retail small business line, per retail small business customer, per retail residential line, and per retail residential

customer. If this information is not available on a wire center basis, please provide it on the next smallest geographic basis for which it is available. Please provide all backup upon which Verizon relied to calculate these amounts. Please provide the definition of small business customer that Verizon used in answering this question.

ATT-VZ-16 Please provide Verizon's average "take rate" for vertical features for small business customers, and for residential customers.

ATT-VZ-17 Provide all internal documents that refer to, relate to, or discuss the profitability of Verizon using self-provided switching and unbundled loops leased from an ILEC to serve residential or business customers served by analog loops (hereinafter "mass-market customers") in any out-of-region area, or that refer to or discuss any operational or economic obstacle Verizon has encountered in any effort Verizon has made to implement or expand its out-of-region local market entry strategy. For this purpose, "out-of-region" refers to geographic areas within the United States but outside of the areas within which Verizon is the incumbent local exchange carrier ("ILEC").

Questions Relevant to Verizon's Hot Cut Proposals

ATT-VZ-18 Please provide UNE-Loop quantities provisioned by Verizon by wire center in Massachusetts for each quarter from January 2001 to the present, distinguishing between business and residence lines, and stating quantities separately for: (a) new CLEC customer lines, (b) pre-existing CLEC customer lines transitioning from total service retail, (c) pre-existing CLEC customer transitioning from UNE-P, (d) ILEC retail customer migration to CLEC, and (e) CLEC-to-CLEC migration.

ATT-VZ-19 Please state for each quarter and each Massachusetts wire center: (a) the average number of unbundled loops provisioned by Verizon on a daily basis for the quarter, (b) the fewest number of unbundled loops provisioned in a work day during the quarter, and (c) the maximum number of unbundled loops provisioned in a work day.

ATT-VZ-20 Provide the quantity of UNE-P lines in service in each Massachusetts wire center, separated by business and residence, as of January 1, 2002, July 2, 2002, January 1, 2003, July 1, 2003, and at present (specifying the date through which data is reported).

ATT-VZ-21 Provide for each wire center in Massachusetts on a monthly basis the number of CLEC-served lines for which disconnects have been processed (Customer Service Provider Change or Other Reason), separated by UNE-P and UNE-L, and, if available, for each UNE-P and UNE-L category, further broken out between business and residential customers.

ATT-VZ-22 Has Verizon ever estimated, or communicated to any CLEC, the total number of cutovers Verizon is capable of performing per day per central office in Massachusetts, or for some geographic grouping or groupings of central offices in Massachusetts? If yes:

(a) Provide the substance of those estimates or communications, including all documents discussing or concerning limitations on the number of hot cuts that can be performed. Please explain in detail the reasons for imposing these limits, and provide all documents describing or discussing the limits or the decision to impose them.

(b) Please define and explain the areas (e.g., a manager's area) for which such limits are established, and explain the basis or reasons for these area definitions.

(c) If there are differences in the maximum number of cutovers that can be performed in different central offices or geographic areas, please explain in detail the reasons for the differences.

ATT-VZ-23 For each month since January 1, 2001, please provide the total number of loop cutovers by wire center that resulted in the loop being swung back to Verizon's switch, and also specify how many of these occurred within 10 days of the provisioning due date and how many occurred beyond 10 days of the provisioning due date.

ATT-VZ-24 Has Verizon considered deploying NGDLC arrangements that packetize both the voice and data services? If so, please describe all such alternatives considered and produce all documents that refer, concern, or discuss Verizon's deployment or potential deployment of NGDLC arrangements that packetize both the voice and data services.

ATT-VZ-25 What percentage of Verizon's copper facilities in Massachusetts has been retired, on a per line basis? Please provide the basis for your calculation, including the nature and sources of data used.

ATT-VZ-26 Describe with specificity Verizon's plans to retire any copper loop plant in Massachusetts. Please provide any documents describing such plans.

ATT-VZ-27 Please describe with specificity the process Verizon uses in retiring copper loop plant. Please specifically include in your answer the notice Verizon provides to CLECs that provide service to customers using the plant and what options will be available to CLECs providing voice and/or DSL service to customers served by copper loop plant that Verizon plans to retire.

ATT-VZ-28 Please provide the number of lines served by DLC in Massachusetts for which alternative copper loop facilities are currently not available.

ATT-VZ-29 Please identify what percent of hot cut LSRs received by Verizon-Massachusetts in the last 12 months for which data are available have required a field dispatch to remove a customer from an access line(s) provisioned on an IDLC system. Please explain how you calculated or estimated the percentage and provide supporting work papers.

ATT-VZ-30 What percentage of access lines that Verizon currently provisions to CLECs in Massachusetts on a UNE-P basis are provisioned on IDLC systems?

ATT-VZ-31 Please describe with specificity the process by which CLECs providing voice service to a mass market customer utilizing its own switches together with unbundled loops leased from Verizon could add data service. Please provide the following information regarding the process:

(a) Please state whether the process is mechanized or manual. If the process is mechanized, please state whether the service orders flow through the process without manual intervention. If orders do flow through, please state the percentage of the service orders that flow through to completion;

(b) Please list the recurring and nonrecurring charges the CLEC would incur;

(c) Please provide the average service outage experienced by the end user customer;

(d) Please state whether the loop would be reused or whether new facilities would be provisioned;

(e) Please state whether information in downstream databases, including 911, LIDB and directory listings would be impacted. If your answer is yes, please explain all such effects in detail.

ATT-VZ-32 Does Verizon have logs or other records documenting the time required by its employees to complete the tasks associated with either the individual or the bulk hot cut process? Please list each task for which completion time is recorded. Please provide such records, organized by the CO location in which the recorded work occurred. Please also provide any documentation that contains descriptions or instructions concerning these records.

ATT-VZ-33 Please identify any Massachusetts central offices in which Verizon has never performed a hot cut.

ATT-VZ-34 How many separate cross-connections are typically required for Verizon to complete a hot cut on a:

(a) Cosmic Distributing Frame?

(b) Main Distributing Frame with Intermediate Distributing Frames?

(c) Main Distributing Frame without Intermediate Distributing Frames?

ATT-VZ-35 For each Verizon host and remote central office, please state whether access lines are cross-connected via a:

(a) Cosmic Distributing Frame

(b) Main Distributing Frame with Intermediate Distributing Frames

(c) Main Distributing Frame without Intermediate Distributing Frames

(d) any combination of (a), (b), or (c).

ATT-VZ-36 What percentage of access lines that Verizon currently provisions to CLECs in Massachusetts on a UNE-P basis are located in (1) staffed COs and (2) unstaffed COs? If these two numbers do not sum to 100 percent, please explain why. Please state the date that Verizon used when calculating the percentages.

ATT-VZ-37 What percentage of access lines that Verizon provides to its retail customers in Massachusetts are located in (1) staffed COs and (2) unstaffed CO's? If these two numbers do not sum to 100 percent, please explain why.

ATT-VZ-38 Please explain and list all system modifications made since 1998 that affect the flow through capabilities of the Verizon's OSSs used to process hot cut orders. Please explain and list all Verizon OSS system modifications planned in anticipation of, and related to, the provisioning of bulk hot cuts.

ATT-VZ-39 Please provide copies of all Verizon materials, documents or job aids describing methods and procedures related to the performance of individual or bulk hot cuts and associated number portability.

ATT-VZ-40 Please explain how Verizon's performance conducting bulk hot cuts is treated under the currently effective Performance Assurance Plan in Massachusetts ("PAP"). Please identify each provision in the PAP upon which Verizon relies for its answer.

ATT-VZ-41 For each day between August 1, 2000 and August 1, 2003, or for the latest period in which this information is available, and for each Verizon central office, please separately provide the number of interLATA and intraLATA PIC changes processed by Verizon.

Questions Relevant to Verizon's Dedicated Transport Claims

ATT-VZ-42 For each pair of central offices between which Verizon, in its Initial Panel Testimony, claims that two or more unaffiliated carriers provide transport, please provide the following information each of the identified carriers:

(a) The number of transport circuits terminating at the carrier's physical collocation facilities;

(b) If known, the level of each transport circuit terminating at the carrier's physical collocation facilities; and

(c) Whether Verizon has provided a dark fiber indefeasible right-of-use ("IRU") on a long-term basis (10 or more years) to the carrier.

ATT-VZ-43 Please provide, in manipulable electronic form (e.g., spreadsheets), copies of all source data, exhibits, tables, maps, spreadsheets, programs, and all other supporting data and source materials for Attachments 5 and 6 to Verizon's Initial Panel Testimony regarding Dedicated Transport (dated November 14, 2003).

ATT-VZ-44 With regard to the transport routes that Verizon claims in its Initial Panel Testimony regarding Dedicated Transport (dated November 14, 2003) meet the transport triggers specified in the Triennial Review Order, please provide the following information for each carrier that Verizon claims is a wholesale provider of transport:

(a) All evidence that Verizon has that the carrier actually leases wholesale transport to other carriers; and

(b) All evidence that Verizon has of the specific routes on which the carrier actually leases such transport to other carriers

ATT-VZ-45 Please provide a table or chart, similar to those provided in Attachment 6, that (1) separately identifies the 81 pairs of wire centers that Verizon says in its Initial Panel Testimony regarding Dedicated Transport (dated November 14, 2003) (p. 36) meet the FCC's wholesale trigger but not the self-provisioning trigger and (2) shows which carriers provide wholesale transport between these paired wire centers.

ATT-VZ-46 Of the carriers that Verizon has identified as having "deployed fiber transport facilities primarily, if not exclusively, for use by other carriers" Verizon's Initial Panel Testimony regarding Dedicated Transport (dated November 14, 2003) (p. 36):

(a) Please provide the names of each of these carriers in addition to those specifically identified on p. 36 of the testimony (i.e., carriers other than NEESCOM, NEON, and Metromedia Fiber).

(b) Please explain fully why these carriers are counted in Attachment 6 toward both the self-provisioning and the wholesale triggers.

(c) For each of these carriers, please specify all transport routes on which Verizon claims the carrier provides wholesale transport but does *not* count toward the self-provisioning trigger.

AT&T Communications of New England, Inc.,
By its attorneys,

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